


APPENDIX A. Comments on the Kelly Island FAS Improvement Project EA received by FWP. (Comments received via E = email, M = mail.)

Com- men- ter #	Via	Para- graph	Comment
1	E		The plan looks great, the additional parking and loop road should help a lot. Good job with planning.
2	E		The attachment for the EA is missing [from FWP website]. [FWP emailed him that the attachment was at the end of the EA document posted on FWP's website.]
3	E	i	[This comment was signed by 2 people] We have attached our comments on the Draft Environmental Assessment for the Kelly Island Fishing Access Site.
		ii	Thanks for the opportunity to review this document. We are looking forward to seeing this plan move forward.
		1	We have reviewed the Draft Environmental Assessment for the Kelly Island Fishing Access Site, Proposed Improvement Project, Jun 2014, and visited this site to look at your proposal. We have the following comments for your consideration.
		2	In looking at your design and at the site we are concerned about the vegetation that will be within the loop. We suggest that you plan for vegetation in this area and how to retain and manage the vegetation in the loop. We suspect it could be hard to retain vegetation in this area without some planning.
		3	The trail along the river toward the confluence of the Bitterroot and Clark Fork rivers needs some repair and maintenance. There is some serious river erosion below this trail that needs attention. It is not clear from the material that we reviewed whether this trail is included in your plan. If it isn't it needs to be. See picture below.
			
4			The sign at this site needs to be updated to show the motor boat closure on the Bitterroot.

		5	We would like to see the signs designating public and private land between the Kelly Island Montana Fish, Wildlife and Parks land and the private land to the East, from the Fishing Access and the Bitterroot River redone. They have been in place several years and in several cases are not very visible.
4a	E	1	This letter is written in response to the Kelly Island Fishing Access Site Proposed Improvement Project and the draft Environmental Assessment.
		2	I am very concerned about the impact of these improvements in the middle of a residential area. The proposed action is designed specifically to accommodate ease of boat launching and boat fishing. Thus, it directly supports and encourages commercial guiding services which results in increased traffic and business operations in a part of the community which is zoned as residential.
		3	Page 17 of the Guide to the Montana Environmental Policy Act explicitly states that: "Agencies must consider the effects of pending decisions on the environment and on people prior to making each decision." The impact of this project will have a very detrimental effect on the residential area surrounding Kelly Island. While the site itself enhances the area by providing hiking, birding, tubing, and shore-side fishing, the construction project as described is designed not to complement residential activities but to promote development that is not consistent with the location.
		4	This project would fit well with the new Third Street bridge project or with the existing MacClay Bridge by integrating it with the flow of regular traffic to the river. Page 18 of the MEPA guide further states: "MEPA provides a process that can help ensure that permitting and other agency decisions that might affect the human environment are INFORMED DECISIONS—informed in the sense that the consequences of the decision are understood, reasonable alternatives are evaluated, and the public's concerns are known."
		5	Encouraging increased traffic and business operations in the midst of a residential area will have significant consequences on the human environment surrounding Kelly Island. Already conflicts exist between boat trailers moving quickly to complete their drop-offs and children, runners, bikers, hikers, and neighbors. Further development will compound these conflicts, will increase the inevitable chance of accidents, and will increase the need for Sheriff Office patrols.
		6	While MEPA does not require multiple options, Kelly Island offers an opportunity for Option C--pave and stabilize the area for stream-side fishers, tubers, hikers, and birders. [Add bike racks to complement the extensive bike trails in the area and complement these neighbor-friendly initiatives.] Use the bulk of these funds to develop alternate locations where guide services can efficiently conduct their business without operating in conflict with residential zoned locations.
		7	It seems incongruous to [develop this site to] exclusively meet the needs of commercial businesses whose activities are in conflict with the many recreational activities that make Kelly Island unique and a complement to the surrounding neighborhood and community.
		8	Thank you for considering these concerns.
4b	M		[This person also mailed comments that were identical to his or her emailed comments #4a, except in paragraphs 6 and 7 above, where the words in brackets did not appear in the mailed letter.]
5a	E	1	This letter is in reference to the Environmental Assessment (EA) by Montana Fish, Wildlife & Parks (MFWP) for site "improvement" for the Kelly Fishing Access Point.
		2	My comments relate to fisheries science and guidelines in <i>A Guide to the MONTANA ENVIRONMENTAL POLICY ACT (GMEPA)</i> (accessed 15 July 2014).
		3	As evident in Hughes et al. 2014, 'A review of urban water body challenges and approaches (1) rehabilitation and remediation', <i>Fisheries</i> Vol 1: 18-29, (and elsewhere) bank erosion can be a desirable attribute of rivers and a natural flow regime is the paradigm for river conservation and restoration.
		4	It is not clear why cumulative effects (CMEPA, p15) are ignored in the EA. The relevance of defining a protected corridor where bank erosion can freely occur is central to understanding river management (G. Chone, 2014, Links between channel mobility and habitats: on the importance of protecting mobility space for rivers,' 144th Annual Meeting of the American Fisheries Society, and others).

		5	A variety of spatial scales are included in the EA--Bitterroot Valley to the access site. A variety of boundary controls exist from bridges to bank stabilization. There is no discussion on how active intervention (bank stabilization) will impact other scale-dependent river controls. (Gregory B. Pasternack, 2008, 'Spawning Habitat Rehabilitation: Advances in Analysis Tools,' <i>American Fisheries Society Symposium</i> 65: 321-348, among others).
		6	Recreational uses of unsurfaced trails inevitably result in their degradation, with the type and extent of resource impact influenced by factors such as soil texture, topography, climate, trail design and maintenance, and type and amount of use. Of particular concern, the loss of soil through erosion is generally considered a[s] significant and <i>irreversible</i> (italics added) (Olive, N. D., and J. L. Marion, 2009, The influence of use-related, environmental, and managerial factors on soil loss from recreational trails, <i>Journal of Environmental Management</i> 3: 1483-1493). The expansion and surfaced parking as well as the commercial-level boat ramp at the Kelly Site will increase both recreational use and its <i>irreversible</i> impact. This <i>irreversible</i> impact is not evident in the EA and therefore in conflict with the GMETA (p.17) requirement that 'Agencies must consider the effects of pending decisions on the environment.'
		7	FW&P has a trout identification guide at the Kelly Site as well as many access sites in western Montana. This suggests concern about harvest, particularly for the listed bull trout. Level of fishing and fish mortality are general related as is the impact of water temperature (Boyd, J. W., et al. 2010, Effects of catch and release angling on salmonids at elevated temperature, <i>North American Journal of Fisheries Management</i> 30: :898-907). The presence of the identification guide suggests concern over the identification and mortality of the listed bull trout. Although the catch and mortality release rates were lower than predicted (<30%) in Montana by Boyd et al., the EA provides no indication of how the increases in fisher numbers and fishing pressure will impact bull trout or other trout particularly during warm water closures. The literature would suggest a marked increase in mortality which should be addressed in the EA.
		8	Lastly, missing entirely in the EA is the GMEPA purpose that 'Agencies must consider the effects of pending decisions on the environment and on people prior to making each decision.' Clearly, no more than a few miles away, McClay Flats recreational area recognizes what an area with multiple use should be when bordering a residential area--from dogs on leash to a walk-in boat ramp. The EA has no discussion of the increased truck/trailer traffic related to children crossing Spurgin Road on their way to Target Range School to what I would predict is an ever growing police presence--a clear and irreversible cost to the 'people' if the decision is to pave at the Kelly site. What this EA suggests is the lack of long-term coordinated planning by MFWP (is the Kelly site a priority, where does it fit, and so on), the lack of science, and indicating little more than random use of Federal Trust funds.
		9	Thank you for the opportunity to comment
5b	M		[He also mailed comments that were identical to his emailed comments above, except for a minor addition in para 6 above, noted in brackets.]
6	E	1	Thought I would give you another quick update on the access site traffic flow after the posted hours (It has been 2 years since the gate has not been locked on a daily basis).
		2	I notice that often there are vehicles using the access road as late as 11 PM, with the greater traffic during the warmer months. Fortunately, I have not noticed a change in the noise level coming from the river or an actual increase in parties. So, overall, there does not appear to be a need to change the practice of not locking the gate, at least for now.
		3	In response to the proposal for a site improvement, I appreciate the request for public input. While the proposal appears well conceived and potentially a positive for the land and river environment at the access point, my concern is that the traffic flow will increase significantly with the "new and improved" roadway, ramp, etc. I suspect that with the increased traffic flow, there will be more noise, late night congregation, and parties. If such consequences occur, I would hope that the gate closings could be reconsidered and possibly reinstituted.
		4	Hope all is well for you. Please contact me if you have any questions.
7	E	1	Thanks for the copy of the draft environmental assessment of the Kelly Island Fishing Access Site Improvement Project. I am a homeowner with a property adjacent to the state park and very close to the FAS. I have read the draft EA and want to share my concerns with you:

2	1) my first concern is that there are no alternatives other than do nothing or full implementation. Certainly, there are reasonable alternatives in the middle that could be considered that help to meet FWP objectives for the FAS without a great disturbance to the existing site. For example, the boat ramp could be improved and the bank stabilized without additional improvements such as making a loop road that could lead to increased use.
3	2) my second concern is regarding the increased use with an improved site, a problem that is barely addressed in the EA. Here are just a few of the many obvious questions that are insufficiently addressed in the draft document. How much more use is predicted with an improved FAS? How will this increased use impact Kelly Island, the Clark Fork River, and the surrounding neighborhood? Will FWP have the resources to schedule more frequent maintenance of the improved site as well as regular patrols to lock the gate in order to curtail an already burgeoning problem with late night use. How will increased vehicle use (with boat trailers) impact Spurgin Rd or the safety of neighborhood children?
4	I thank you for the opportunity to comment and I hope that you can take my comments into account when considering the project approval.